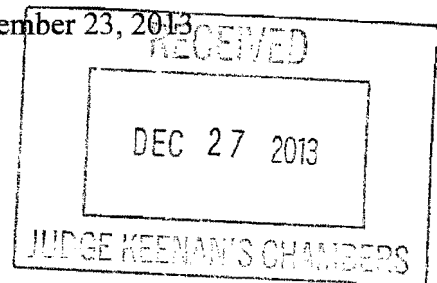




**MEMO ENDORSE**

December 23, 2013



**VIA HAND DELIVERY**

Honorable John F. Keenan  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1930  
New York, New York 10007-1312

Re: *Jagarnath Sahu, et al. v. Union Carbide Corp., et al.*, 07 Civ. 2156 JFK

Dear Judge Keenan:

I am co-counsel for Plaintiffs, and am writing to Your Honor to request an adjustment in the schedule for the above-entitled matter. A previous adjustment was requested by Defendant, consented to by Plaintiffs and granted by the Court on October 4, 2013. I have conferred with Mr. Heck, one of Defendant's counsel, and he is agreeable to the following revised schedule, subject to Your Honor's approval.

Plaintiffs' opposition to Defendants' summary judgment motion is now due January 7, 2014. Due to an unexpected crush of work – including, *inter alia*, an emergency stay in the Second Circuit, and, in an appeal that the Ninth Circuit expedited *sua sponte*, a briefing deadline of January 6 – as well as the upcoming holidays, we respectfully request consent to file our opposition on January 21, 2014, with a reciprocal adjustment for Defendant's reply, as follows:

Plaintiffs' Response	January 21, 2014 (instead of January 7, 2014)
Defendants' Reply	February 25, 2014 (instead of January 28, 2014)

Thank you for your consideration of this request.

Respectfully submitted,

*Richard L. Herz*  
Richard L. Herz

The application is granted.

SO ORDERED.

Dated: New York, N.Y.  
Dec. 27, 2013

*John F. Keenan*  
U.S.D.J.

